

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

The State of Texas, et al.,

Plaintiffs,

v.

Google LLC,

Defendants.

Case No. 4:20-cv-00957-SDJ

Hon. Sean D. Jordan

**UNOPPOSED MOTION TO FILE UNDER SEAL**

Plaintiff States (“States”) respectfully move the Court for leave to file under seal PLAINTIFF STATES’ RESPONSE TO GOOGLE’S MOTION TO STRIKE and the exhibits thereto (“States’ Response and Exhibits”), to be filed later today. Defendant Google LLC (“Google”) does not oppose the States’ sealing request.

The States, with Google’s consent, request to file under seal the States’ Response and Exhibits because: they respond to, cite, or attach materials including expert reports that Google, in requesting to seal its Motion to Strike, has stated “reflect non-public, highly sensitive commercial and technological information that, if disclosed publicly, would likely cause Google competitive harm.” *See* ECF No. 612 at 2. Consistent with Local Rule CV-5, the States will work with Google to file a redacted version—with as limited redactions as possible—of the above-referenced documents within seven (7) days.

For the reasons stated above, the States respectfully request that this Court allow the States to file the above-referenced documents under seal.

Dated: October 1, 2024.

Respectfully submitted,

/s/ W. Mark Lanier

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*Submitted on behalf of all Plaintiff States*

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**CERTIFICATION OF CONFERENCE**

I certify that counsel has complied with the meet and confer requirement in Local Rule CV-7(h), conferring on October 1, 2024 via email with counsel of record, and that Google LLC does not oppose the foregoing sealing request.

/s/ Geraldine Young  
Geraldine Young

**CERTIFICATE OF SERVICE**

I certify that on October 1, 2024, this document was filed electronically in compliance with Local Rule CV-5(a) and served on all counsel who have consented to electronic service, per Local Rule CV-5(a)(3)(A).

/s/ Geraldine Young  
Geraldine Young